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May 28, 2015

VIA HAND DELIVERY

Hon. Alvin K. Hellerstein
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Vera v. Rep. of Cuba
12 Civ. 1596 (AKH)

Dear Judge Hellerstein:

I represent Banco Bilbao Vizcaya Argentaria S.A. (“BBVA”). We have made a motion for a stay of discovery pending appeal (the “Stay Motion”). The Stay Motion was fully submitted on May 7, 2015, when BBVA submitted its reply memorandum of law. Docket No. 766.

The deadline for providing information in response to Vera’s Subpoena is currently fixed as June 2, 2015. I write to respectfully request that the Court extend that deadline to a date that is two weeks after the Court decides the Stay Motion, assuming that the Court denies the Stay Motion. A two-week period is, I respectfully suggest, reasonable in length, and necessary and appropriate to facilitate an orderly response to the Court’s ruling.

Respectfully submitted,



Kenneth A. Caruso

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cc: All Counsel (via e-mail)